

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking Into)	
Implementation of Federal Communications)	
Commission Report and Order 04-87,)	Rulemaking 04-12-001
as it Affects the Universal Lifeline)	(Filed December 2, 2004)
Telephone Service Program.)	
_____)	

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK, THE NATIONAL
CONSUMER LAW CENTER, DISABILITY RIGHTS ADVOCATES AND THE LATINO
ISSUES FORUM AND ON THE PROPOSED DECISION ADOPTING STRATEGIES TO
IMPROVE THE CALIFORNIA LIFELINE CERTIFICATION AND VERIFICATION
PROCESSES, AND REINSTATING PORTIONS OF GENERAL ORDER 153 AND THE DRAFT
STAFF REPORT**

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April 30, 2007

I. Introduction

Pursuant to Rule 14 of the Commission's Rule of Practice, The Utility Reform Network, the National Consumer Law Center, Disability Rights Advocates and Latino Issues Forum (hereinafter referred to as "Joint Consumers") submit these reply comments on the Draft Decision of ALJ Jones on April 3, 2007 adopting strategies to improve the California Lifeline Certification and Verification Processes and reinstating portions of General Order 153 ("Proposed Decision") and Draft Staff Report ("Staff Report").

II. Joint Consumers Support AT&T's Proposal To Keep The Suspension In Place Until The Mailings Are Sent First Class

In Opening Comments, Joint Consumers expressed concern over lifting the suspension of the verification process until more progress is made implementing the short term and long term fixes included in the Proposed Decision and Staff Report. AT&T expresses similar concerns (AT&T at 3). Joint Consumers support AT&T's proposal that the Commission keep the suspension in place until the first class mail issue is resolved and other process improvements have been made. As AT&T points out, much of the Commission's and Staff's work is meaningless if the LifeLine subscriber does not receive the proper forms in a timely manner. Ensuring that correspondence from Solix is sent first class mail should be one of the Commission's top priorities for this project. Only once that goal has been reached, and the Commission is comfortable that progress has been made, should the suspension be lifted. Joint Consumers also strongly agree with AT&T's alternative proposal that the Commission conduct a 10% sample test for the initial verifications that are processed once the suspension is lifted. Indeed such a trial run is a good business practice and should be undertaken regardless of when the suspension is lifted (AT&T at 4).

Joint Consumers also support the proposal to include an implementation period for all the other fixes¹ (AT&T at 5). We proposed a three month delay in lifting the suspension, in part to allow the stakeholders to make necessary changes. Joint Consumers will leave it up to the carriers and Solix to propose the right amount of time, but agree that apart from the first class mailing issue, some number of months will be necessary to ensure successful implementation of these process improvements.

III. Enrollment on First Contact Must Remain In Place

Verizon, SureWest and the Small LECs have proposed to change the certification process to require pre-qualification, yet they have not provided any satisfactory arguments as to why the Commission should back away from its earlier well-considered decision to use enrollment on first contact

¹ Verizon also requests an implementation period, although their proposal is specific to the reminder notice requirement as part of their confirmation letter process (Verizon at 10-11).

(Verizon at 3-4, SureWest at 10-11, Small LECs at 4-6). Joint Consumers do not think it is appropriate for the current certification problems, which are due in large part to the havoc wrought by the use of standard mail (Staff Report at 18, 29-30), inadequate and inaccurate information about the program provided by customer service representatives (Staff Report at 12) and lack of adequate outreach (Staff Report at 2, 22), to become an excuse for a wholesale change of the well-established, long-standing process of enrollment upon first contact. In D. 05-12-013, the Commission found that allowing customers to enroll with a single phone call simplifies the enrollment process (FF 1) and that “The FCC’s rules allow us the flexibility to craft a California approach that will allow customers to be enrolled at the point of the first customer contact.”(COL 2). The serious implementation problems have not allowed for the process to function as originally designed and there is no question that these implementation problems with the certification process need to be analyzed and addressed in this next phase of this proceeding. However, this well-established consumer-friendly approach must not be changed.

Backbilling: Verizon, Sure West and the Small LECs have raised concerns about the effect of backbilling potentially large amounts on consumers who are near-eligible because their incomes are near the income cut-off (Verizon at 3-4, SureWest at 10-11, Small LECs at 5). The financial situation of these consumers is not that different from those who meet the income guidelines, and a large backbill could jeopardize their access to phone service. However, moving to pre-qualification for the purported sake of protecting this subset of Lifeline applicants would cause more harm to the larger eligible population, in particular the traditionally harder to reach populations. As Joint Consumers have discussed in our opening comments, requiring consumers to pay a deposit, a connection charge and a regular rate is a barrier to participation for low-income consumers.² Furthermore, there are ways to lower the number of ineligible applicants from applying in the first place and to mitigate the difficulties faced by consumers with a backbill. As has been addressed in the Staff Report, Joint Consumers’ Comments and Greenlining’s comments (Greenlining at 8), there has been a serious lack of coordinated and adequate outreach efforts to eligible consumers. One key component of consumer outreach and education should be the highlighting of the consequences of failing to qualify for Lifeline. Another way to reduce the number of ineligible consumers is to ensure that the customer service representatives are complying with G.O. 153 section 4.2.1. We note that sections 4.2.1.2.1.1. and 4.2.1.2.2. include information about the charges that will be billed if a consumer is found ineligible. As stated in the Proposed Decision and Staff Report, there have been compliance problems with two of the major carriers (Proposed Decision at 5,

² See also Staff Report at 33 (“Staff believes the higher initial costs of a pre-qualification process may act as a barrier to enrollment for low-income Californians, especially those in traditionally hard to reach demographic groups.”).

Staff Report at 12) in regard to the completeness and accuracy of the Lifeline information provided. Another way to mitigate harm to the subset of consumers faced with a large backbill due to failure to qualify is to allow the consumers a reasonable payment plan so that these charges can be paid back over a reasonable time. This will help keep these customers from losing service due to an unaffordable bill.

Joint Consumers recognize that the expanded timeline in the proposed decision could create a risk of non-payment for carriers in light of the 3-month limitation on backbilling a customer. This is an issue that should be addressed in Phase 2 of this proceeding. During that phase, the Commission and carriers should gather data to determine whether backbilling is an actual a problem. If so, the Commission could consider such proposals as made by the Small LECs that the fund cover undue discounts received beyond three months where the certifying agent does not process certification documentation in a timely manner (Small LECs at 11). We note that the expanded timeline proposal is being proposed as a short-term response to the serious shortcomings of standard mail. Once the mailings are switched to First Class, we expect the timeline will retract as the need for additional time to address the lag in receipt of forms and notices is removed. Thus, a potential short-term backbilling problem for the carriers should not be the basis to implement a huge barrier to participation for eligible low-income consumers.

Incentives for Filling Out the Certification Form: Verizon, SureWest and Small LECs raise concerns that consumers do not have an incentive to promptly return forms under the current certification process and argue that this is a reason to move to pre-qualification (Verizon at 4, SureWest at 10 and Small LECs at 5). At this point in time, there are no data to confirm this statement. Joint Consumers note that the maintenance of the discount is an incentive for consumers to return their form and adequate consumer education on the consequences of failure to qualify would also provide an incentive to return the certification form. Furthermore, the well-established former ULTS program also allowed enrollment upon first contact and the participation rates were much higher than they are now (Staff Report at 6, 32, 39).

Instead of looking at the “motivation” of the consumer, the focus must be on the use of standard mail as a likely cause for the low response rate, as discussed elsewhere. Customers who contact their carrier to receive Lifeline service are not receiving their certification forms soon after contacting their carrier, instead there is a lag of eight to ten days before the form even arrives (Staff Report at 18). Expecting a consumer to remain vigilant after a week or longer for an important piece of mail is unreasonable. The carriers have expressed their frustrations with the use of standard mail. The Small LECs state, “In many cases, getting certification documents to customers swiftly could make the difference between a customer following up to obtain a LifeLine discount, and letting the matter slip due to the press of other concerns.” (Small LECs at 4). SureWest has commented that, “under the new

Lifeline certification program, the most significant cause of the low response rate and customer complaints is the fact that customers are not receiving certification documents in a timely manner.” (SureWest at 2). AT&T notes that, “AT&T California’s experience is that a significant number of our customers tell us that they have never received the form. Therefore, just expanding the timeframe and sending additional reminder notices is not going to assist those customers who never received the forms.” (AT&T at 3). Additionally, as raised by SureWest and the Small LECs, consumers should have other avenues to access their forms (SureWest at 12; Small LECs at 6-7).

In any event, until all of the problems discussed above are addressed satisfactorily, it is pointless to even entertain the pre-qualification proposal.

IV. Joint Consumers’ Comments on Other Carrier Proposals

A. Access to Forms: Joint Consumers strongly support the proposal by SureWest and the Small LECs to increase the number of ways a consumer can obtain necessary forms (SureWest at 12; Small LECs at 6-7). Indeed, much of SureWest’s proposal regarding web-posted forms and availability of forms through CBOs is very similar to some of the proposals the Joint Consumers have been making throughout this proceeding. Given the unreliability and delayed delivery of standard mail, Joint Consumers share SureWest’s and the Small LECs’ doubts that even with the extended certification timeline consumers will have enough time to seek a second form and return it (SureWest at 12, Small LECs at 6-7). AT&T also discusses how important it is that subscribers receive the forms in a timely manner and makes two valuable proposals (AT&T at 4-5). Joint Consumers agree that the customer should receive as many forms as possible during the certification and verification processes. Joint Consumers also support the directive to Solix to process the applications once they are received no matter how late the customer returned the form. The key is to get the information and the form into the consumers’ hands. That, along with proper education about the process, will surely increase response rate and decrease customer confusion and customer inquiries. SureWest also joins the Joint Consumers in highlighting the importance of the web-based system as an additional way to facilitate enrollment (SureWest at 13).

B. Use of the Resolution Process: Cox opposes the proposal to allow Staff to make changes to the General Order via a resolution process (Cox at 6). Joint Consumers also expressed some hesitation with this proposal in their Opening Comments. However, if the safeguards are put in place as offered in the Joint Consumers’ comments ensuring adequate notice and opportunity to comment on the resolutions at issue, Joint Consumers believe this should assuage Cox’s concern. Joint Consumers are not, however, proposing formal amendments to the Rules of Practice and Procedure. Instead, the Final Decision should

explicitly set out the process that Staff must use only for those resolutions that propose amendments to G.O. 153.

C. Frequency of Working Group Meetings: Joint Consumers find Cox's proposal to change the Working Group meeting frequency to monthly premature (Cox at 6). There are still too many moving parts and unfinished business to consider a move to monthly meetings. Joint Consumers note that the Working Group meeting is one of the only places that Joint Consumers can remain up to date on the implementation progress and problems that may arise. The participants should continue to meet once every two weeks for at least the next several months.

D. Database True-Ups: Joint Consumers note the concern expressed by Verizon and Cox regarding the integrity of the Solix database and their proposal to institute a regularly scheduled true-up of the data (Verizon at 6-8; Cox at 5). Joint Consumers understand that data integrity and communication issues have been a problem throughout this process. Joint Consumers will not speak to how often these true-ups should occur, but find the proposal to be not only reasonable but vital to mitigate problems caused by poor or inconsistent database management. These are problems that ultimately affect the consumer directly. These true ups may also help sound an early warning to problems Solix may be having processing data on a more global scale.

April 30, 3007

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/S/

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CERTIFICATE OF SERVICE

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On April 30, 2007 I served the attached:

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK, THE NATIONAL
CONSUMER LAW CENTER, DISABILITY RIGHTS ADVOCATES AND THE LATINO ISSUES
FORUM AND ON THE PROPOSED DECISION ADOPTING STRATEGIES TO IMPROVE THE
CALIFORNIA LIFELINE CERTIFICATION AND VERIFICATION PROCESSES, AND
REINSTATING PORTIONS OF GENERAL ORDER 153 AND THE DRAFT STAFF REPORT**

on all eligible parties on the attached lists to **R.04-12-001**, by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this April 30, 2007, at San Francisco, California.

_____/S/_____
Larry Wong

CALIFORNIA PUBLIC UTILITIES COMMISSION

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Filer: CPUC - ILECS, CLECS

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